

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civ. No.

2022 DODGE DURANGO SRT 392,  
VIN: 1C4SDJGJ2NC190004

Defendant-in-Rem.

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

Plaintiff, United States of America, brings this complaint in accordance with Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

**NATURE OF THE ACTION**

1. This is a civil action to forfeit and condemn to the use and benefit of the United States of America property involved in violations of the Controlled Substances Act that is subject to forfeiture pursuant to 21 U.S.C. §§ 881(a)(6) and 881(a)(4).

**DEFENDANT IN REM**

2. The Defendants *in Rem* consists of the following:

a. 2022 Dodge Durango SRT 392, VIN: 1C4SDJGJ2NC190004

(hereafter referred to as “Defendant Property”).

3. The Defendant Property was seized by the Drug Enforcement Administration (DEA) on December 6, 2023, in the District of New Mexico.

4. The Defendant Property is now, and during the pendency of this action will be, in the jurisdiction of this Court.

**JURISDICTION AND VENUE**

5. The United States District Court for the District of New Mexico has subject matter jurisdiction under 28 U.S.C. §§ 1345, 1355(a) and 1356.

6. Venue for this civil forfeiture action is proper in this district pursuant to 28 U.S.C. §§ 1355 and 1395, as acts or omissions giving rise to the forfeiture took place in this district and the property is found in this district. Upon the filing of this complaint, the Defendant Property will be arrested by execution of a Warrant for Arrest *In Rem* in the District of New Mexico.

**FACTS**

7. On December 6, 2023, Drug Enforcement Administration (DEA) seized the Defendant 2022 Dodge Durango SRT 392 from Isaiah Anthony Aragon during the execution of a Federal Search and Seizure Warrant (23-MR-2257) at 5128 Prospector Way NW, Apartment B, Albuquerque, NM 87114.

8. On December 6, 2023, an undercover officer (UC) with the Albuquerque Police Department (APD) contacted Miguel Antonio Ramirez to arrange for the undercover purchase of 30,000 fentanyl pills.

9. Agents followed Ramirez to 5128 Prospector Way NW, Apartment B, Albuquerque, New Mexico 87114. Agents observed Isaiah Anthony Aragon enter the passenger seat of Ramirez's 2022 Honda Civic Touring, carrying a tan colored plastic bag.

10. Agents approached the 2022 Honda Civic Touring and took Ramirez into custody without incident. Aragon tossed a set of key fobs for a 2020 Chrysler 300 S and a 2013 Chrysler 300 SRT 8 into the front passenger seat. Aragon did not obey commands and ran. Aragon was subsequently apprehended and arrested. On the floorboard where Aragon

had been seated, agents found a tan plastic bag containing a large quantity of suspected fentanyl pills. A subsequent weigh of the pills resulted in 3,388.2 gross grams.

11. Simultaneously, agents entered 5128 Prospector Way NM, Apartment B, Albuquerque, New Mexico 87114 to search for persons and secure the residence pending a search warrant. Agents obtained and executed the Federal Search and Seizure Warrant on the apartment.

12. The search revealed \$16,200 in U.S currency, \$44,500 in U.S Currency, an automatic money counter, numerous rubber, and plastic bands consistent with packaging bundles or bulk quantities of currency, a digital scale, and multiple documents belonging to Isiah Anthony Aragon to include a Grand Jury Indictment, a temporary driver's license, and New Mexico Medical Cannabis program card.

13. A 2022 Dodge Durango SRT 392, a 2013 Chrysler 300 SRT 8 and a 2020 Chrysler 300 controlled by Aragon were located and seized at the residence. Although the vehicles belong to Isaiah Anthony Aragon, they are registered to subjects other than Isaiah Anthony Aragon. Drug traffickers will frequently cause vehicles to be registered under other people's names other individuals register vehicles under the separate individual's names, as a means to avoid law enforcement investigations and attempt to prevent seizure of assets acquired with drug proceeds and/or used to facilitate illegal drug trafficking.

14. A post Miranda interview disclosed that Miguel Antonio Ramirez went to 5128 Prospector Way NW, Apartment B, Albuquerque, New Mexico to buy fentanyl pills from Isaiah Anthony Aragon. Ramirez stated that he bought fentanyl from Aragon several times per week.

15. On October 19, 2023, Isaiah Anthony Aragon transported approximately 4,068 fentanyl pills in the Defendant 2022 Dodge Durango SRT 392 and delivered the pills

to Miguel Antonio Ramirez. Ramirez then sold the pills to an UC agent. Aragon was observed as he exited the 2022 Dodge Durango SRT 392, entered Ramirez's Honda Civic Touring and delivered the pills. Aragon departed in the 2022 Dodge Durango SRT 392.

16. On November 15, 2023, Isaiah Anthony Aragon transported over 4,000 fentanyl pills in the 2022 Dodge Durango SRT 392 and delivered the pills to Miguel Antonio Ramirez. Ramirez subsequently sold the pills to an UC agent.

#### **FIRST CLAIM FOR RELIEF**

17. The United States incorporates by reference the allegations in paragraphs 1 through 17 as though fully set forth.

18. Title 21, United States Code, Section 881(a)(6) subjects to forfeiture “[a]ll moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.”

19. Defendant Property was furnished, or intended to be furnished, in exchange for a controlled substance, or constitutes proceeds traceable to such an exchange, or was used or intended to be used to facilitate a violation of the Controlled Substances Act and is thus subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6).

#### **SECOND CLAIM FOR RELIEF**

20. The United States incorporates by reference the allegations in paragraphs 1 through 17 as though fully set forth.

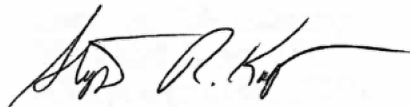
21. Title 21, United States Code, Section 881(a)(4) subjects to forfeiture “[a]ll conveyances, including aircraft, vehicles, or vessels, which are used, or are intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of property in violation of this subchapter.”

22. Defendant 2022 Dodge Durango SRT 392 was used or intended for use to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of illegal controlled substances and is thus subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(4).

WHEREFORE: Plaintiff seeks arrest of Defendant Property and forfeiture of same to Plaintiff, determination of the validity and priority of claims of the Claimants and any Unknown Claimants to the Defendant Property, costs, and expenses of seizure and of this proceeding, and other proper relief.

Respectfully submitted,

ALEXANDER M. M.  
UBALLEZ United States  
Attorney

A handwritten signature in black ink, appearing to read "Stephen R. Kotz", with a stylized flourish at the end.

STEPHEN R. KOTZ  
Assistant U.S. Attorney  
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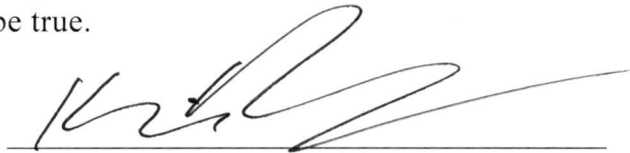
**28 U.S.C. § 1746 DECLARATION**

I am a Special Agent with the Drug Enforcement Administration who has read the contents of the Complaint for Forfeiture *In Rem* to which this Declaration is attached; and the statements contained in the complaint are true to the best of my knowledge and belief.

I declare under penalty of perjury and the laws of the United States of America that this Declaration is true and correct, except as to matters stated on information and belief, and as to those matters, I believe them to be true.

Dated:

6/25/24

A handwritten signature in black ink, appearing to read 'Kevin Mondragon', written over a horizontal line.

Kevin Mondragon, Special Agent  
Drug Enforcement Administration